

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC.;  
ANYTHING GOES LLC d/b/a MAIL  
BOXES ETC., and JCK INDUSTRIES,  
INC., on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

PANALPINA WORLD TRANSPORT  
(HOLDING) LTD., *et al.*,

Defendants.

Case No.: 08-CV-00042 (BMC) (PK)

**DECLARATION OF  
DANIEL C. HEDLUND IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
REIMBURSEMENT OF EXPENSES  
FILED ON BEHALF OF GUSTAFSON  
GLUEK PLLC**

I, Daniel C. Hedlund, hereby declare as follows:

1. I am a Member of the law firm of Gustafson Gluek PLLC. I submit this Declaration in support of Plaintiffs' Motion for Reimbursement of Costs and Expenses in connection with expenses incurred by my firm in connection with this litigation.

2. My firm is one of four Co-Lead Counsel appointed by this Court to represent Plaintiffs and the Plaintiff class in this action ("Co-Lead Counsel"). During the period of August 1, 2016, through the present, my firm has been involved in the following activities, among others, on behalf of Plaintiffs:

- Responded to questions raised by class members regarding the settlements;
- In coordination with court-appointed claims administrator, created, implemented, and supervised a claims administration process, and communicated with class members about their claims;
- Coordinated, drafted and finalized class notice and claims stimulation process and communications;

- Coordinated, drafted and finalized the Court's approved plan of allocation and related projects;
- Worked with claims administrator to follow up with class members to execute payment of claim amounts;
- Coordinated with claims administrator to review and audit claims; and
- Engaged in appellate briefing with the China Chamber of International Commerce regarding its claims and participated in Second Circuit court ordered mediation process.

3. As detailed in Exhibit 1, my firm has incurred a total of \$37,640.06 in unreimbursed expenses during the period of August 1, 2016, through March 31, 2020.

4. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recording of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 15<sup>th</sup> day of July 2020, at Minneapolis, Minnesota.

/s/ Daniel C. Hedlund  
Daniel C. Hedlund

# **EXHIBIT 1**

**Precision Associates, Inc., et al., v. Panalpina World Transport (Holding) Ltd., et al.**  
**Eastern District of New York Case No. 1:08-cv-00042-BMC-PK**  
**Exhibit 1 - Summary of Expenses**  
**Firm Name: Gustafson Gluek PLLC**

**Time Period: August 1, 2016 through March 31, 2020**  
**(does not include expenses submitted in**  
**the previously filed interim fee petitions)**

<b>Type of Expense</b>	<b>Cumulative Total</b>
Assessments to Common Cost Litigation Fund	\$13,700.00
Commercial Copies	
Internal Reproduction / Copies	\$812.55
Court Costs & Filing Fees	\$221.00
Court Reporters & Transcripts	
Computer Research	\$1,132.66
Telephone & Fax	\$456.50
Postage / Express Delivery / Messenger	\$242.98
Professional Fees (expert, investigator, accountant, etc.)(describe)	
Witness / Service Fees	
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$21,047.44
Clerical Overtime	
Miscellaneous (Describe) - flash drive	\$26.93
<b>TOTAL EXPENSES</b>	<b>\$37,640.06</b>